

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SEALED

UNITED STATES OF AMERICA

v.

DENNIS TAYLOR,

Defendant.

) Criminal No. 18 cr 10309  
)  
) Violations:  
)  
) **Counts One and Two:**  
) 21 U.S.C. § 841(a)(1)  
) Distribution of Cocaine Base  
)  
) **Drug Forfeiture Allegation:**  
) 21 U.S.C. § 853  
)

**INDICTMENT**

**COUNT ONE:** 21 U.S.C. § 841(a)(1) – Distribution of Cocaine Base

The Grand Jury charges that:

On or about December 4, 2017, in Quincy, in the District of Massachusetts,

**DENNIS TAYLOR,**

defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWO:** 21 U.S.C. § 841(a)(1) – Distribution of Cocaine Base

The Grand Jury further charges that:

On or about December 13, 2017, in Boston, in the District of Massachusetts,

**DENNIS TAYLOR,**

defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

**DRUG FORFEITURE ALLEGATION**  
(21 U.S.C. § 853)

The Grand Jury alleges that:

1. Upon conviction of one or more of the offenses in violation of Title 21, United States Code, Section 841(a), set forth in Counts One and Two of this Indictment,

**DENNIS TAYLOR,**

defendant herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant --


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.


A TRUE BILL:

  
Foreperson of the Grand Jury

  
David G. Tobin  
Assistant United States Attorney  
For the District of Massachusetts

District of Massachusetts  
September 6, 2018

Returned into the District Court by the Grand Jurors and filed.

  
Deputy Clerk  
9/6/2018 e 2:19pm